

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK (FOLEY SQUARE)**

REBECCA REEVE,
Plaintiff,

CASE NO. 1:23-cv-7280-JLR

v.

MONEX, INC., JOHN GREEN and
GREGORY LYUMKIS,
Defendants.

**CONSENT MOTION TO TRANSFER CASE TO THE
UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA**

Rebecca Reeve (“Reeve”), Plaintiff, moves pursuant to 28 U.S.C. § 1404(a) or, in the alternative, pursuant to 28 U.S.C. § 1406(a), that the Court transfer this action to the United States District Court for the District of Columbia. As grounds for this Motion, Reeve states:

1. Defendants Monex, Inc. (“Monex”), John Green (“Green”), and Gregory Lyumkis (“Lyumkis”), moved to dismiss Reeve’s original Complaint (ECF No. 1), on various grounds, including that this Court did not have personal jurisdiction over Monex and Green and that this Court was not a proper venue for the case. *See* ECF Nos. 14, 15, 15-1.

2. Reeve has filed an Amended Complaint that currently is pending before the Court. *See* ECF Nos. 35, 37.

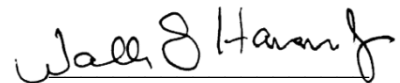
3. The United States District Court for the District of Columbia has personal jurisdiction over Monex and Green.

4. Transfer to the United States District Court for the District of Columbia would be in the interests of justice.

5. Defendants consent to this Motion with the agreement of Plaintiff Reeve that Defendants may move to dismiss the currently pending Amended Complaint within 14 days of the date of transfer to the United States District Court for the District Court for the District of Columbia

on any ground, including that the District of Columbia does not have personal jurisdiction over Defendant Lyumkis.

For the reasons stated above, Reeve respectfully requests that this case be transferred to the United States District Court for the District of Columbia and that Defendants be given fourteen (14) days from the date of transfer to respond to the Amended Complaint currently pending before the Court.




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Plaintiff's request, to which Defendants consent, is **GRANTED**. The Court finds that such a transfer is in the interests of justice and convenience of the parties and potential witnesses. The Clerk of Court is **ORDERED** to transfer the case to the United States District Court for the District of Columbia.

SO ORDERED.

Dated: January 29, 2024
New York, New York


JENNIFER L. ROCHON
United States District Judge